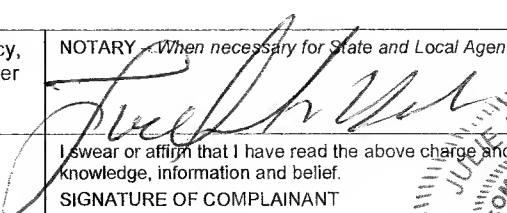
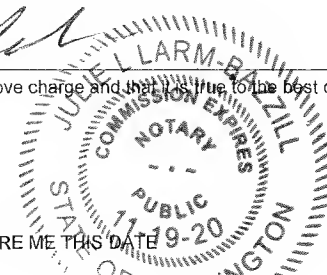


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| CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form. | | Charge Presented to: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC | |
| Washington State Human Rights Commission and EEOC <i>State or local agency, if any</i> | | | |
| Name (Indicate Mr., Ms., Mrs.) Chelsey Glasson | | Home Phone No. (Incl Area Code) [REDACTED] | Date of Birth [REDACTED] |
| Street address [REDACTED] | | City, State and Zip Code | |
| Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.) | | | |
| Name Google | | No. Employees, Members 500 or more | Phone No. (Include Area Code) 206-876-1800 |
| Street Address 601 N 34th Street, Seattle, WA 98103 | | City, State and Zip Code | |
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| THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I, the undersigned, charge the employer identified above with engaging in unlawful employment practices that violate the Civil Rights Act of 1964, as amended, and the Americans with Disabilities Act, as amended, by retaliating against me for reporting discrimination, and by discriminating against me because of my pregnancy and pregnancy complications.</p> <p>I began my career at Google in March 2013 as a Level 3 User Experience (UX) Researcher. Over the course of the next several years, I received strong performance reviews that included two Superb ratings and several Strongly Exceeds and Exceeds ratings. I established a track record of consistent and reliable performance that resulted in multiple promotions, awards, raises, and bonuses within Google.</p> <p>I joined the [REDACTED] team in 2016. I had an excellent relationship with my director, [REDACTED] and her feedback about my performance was overwhelmingly positive. In October 2017, I was promoted from a Level 4 UX Researcher to a Level 5 UX Researcher. At the time [REDACTED] wrote of my performance, "Chelsey is a consistent powerhouse in UX! She has excellent command over many methods, is incredibly pleasant to work with, takes initiative, and sees problems through ... She is a model UX Researcher and is an inspiration to junior UXRs" on her team.</p> <p>In part because of my strong performance history, in February 2018, I transitioned from an individual contributor role into a management position. In that position, I was responsible for managing a team of five employees and an intern, and I reported directly to my director, [REDACTED].</p> | | | |
| (Continued on Attached Pages 2 - 4) | | | |
| I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct. | | NOTARY - When necessary for State and Local Agency Requirements.  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  | |
| Date <u>09/03/2019</u> Charging Party Signature <u>Chelsey Glasson</u> | | SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <u>09/03/2019</u> (month, day, year) | |

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In my March 2018 performance review, [REDACTED] wrote: "Chelsey continues to be rock solid" and that "Chelsey stepping into management has owned it from day 1." She stated, "Her work is impeccable and always has impact on product," and described me as "a role model across [the team] in healthy collaboration." [REDACTED] emphasized, "Chelsey is post promo and consistently meeting expectations with a trend upward."

Given my increased responsibilities as a manager, [REDACTED] emphasized that I was on a "fast track" for a promotion to Level 6. She told me I was on target to receive an "Exceeds" rating in the third quarter of 2018 and a "Strong Exceeds" rating in the first quarter of 2019. [REDACTED] confirmed that she supported my 2019 promotion goal and that this would further advance my Google career.

After my promotion into management, [REDACTED] started making inappropriate comments about a member of my team, including that the employee was likely pregnant again, and that she was overly emotional and hard to work with when pregnant. She also referenced the employee's health condition and stated, "once someone tells you that they have an issue, it's really frustrating because you basically can't touch them." [REDACTED] told me the employee should leave Google. It became clear to me that the director was trying to manage this individual off the team.

In April 2018, I reported [REDACTED] comments to Human Resources and stated I was concerned the employee was being discriminated against. The HR Representative told me my comments may be shared with my director, but not to worry because strong measures were in place at Google to prevent retaliation.

Almost immediately after I made this report to Human Resources, [REDACTED] demeanor toward me changed dramatically. I went from being fast-tracked for promotion to persona non grata. I endured months of angry chats and emails, vetoed projects, her circumventing me and ignoring me during in-person encounters, and public shaming. I subsequently learned she began actively interviewing candidates to replace me, even though we had had no conversations about my leaving the team.

I reported [REDACTED] retaliation to Human Resources on several occasions. Human Resources downplayed the retaliation, said [REDACTED] was being coached, and told me a formal investigation was not warranted.

In July 2018, I became pregnant with my second child. The stress of the retaliation I was experiencing impacted my health and made me physically ill. I was also worried about how the stress was impacting my pregnancy and decided I needed to remove myself from the hostile environment. Therefore, in August, I accepted a management role on the [REDACTED] team.

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When I gave notice that I was leaving my team, I was immediately contacted by [REDACTED] Vice President, [REDACTED] who stressed that I was doing great work and was a coveted member of the team. He asked me to stay on my current team and told me that [REDACTED] was transitioning off the team. Based on these developments, I agreed to stay on the team.

A little over one month later, I was called into a meeting with my skip-level manager, [REDACTED], and told that, contrary to what the [REDACTED] VP had told me, [REDACTED] was not leaving the team. In the same meeting, he told me that [REDACTED] had reported strong negative feedback about my work and indicated I would receive only a "Meets" rating in my third quarter performance evaluation. This was the first time any such feedback was shared with me.

I realized [REDACTED] was trying to performance manage me out of Google in retaliation for my report to Human Resources, and that I needed to transfer teams as soon as possible. Unfortunately, the management position I had been offered on the [REDACTED] team in August had since been filled. I was concerned about having to interview for other positions of similar scope and responsibility while I was visibly pregnant, but realized I needed to move to a new team.

After an internal job search, I was offered and accepted a different management role of lesser responsibility on the [REDACTED] team. However, on October 4, 2018, my new manager, [REDACTED], and my skip-level manager, [REDACTED], told me they were concerned that my maternity leave, which was scheduled to begin in March (five months later), would "stress the team" and "rock the boat." Therefore, they decided that I should not take on any management responsibilities on the [REDACTED] team until after I returned from my maternity leave. Prohibiting a pregnant employee from performing management duties because she would be starting maternity leave in five months is unlawful discrimination.

A few weeks after joining my new team, I was diagnosed with a pregnancy-related condition that was life threatening to me and my baby. My obstetrician told me that I needed to stay close to the hospital in case I needed an emergency cesarean section and that I could no longer travel. She also told me that, depending on how the pregnancy progressed, I may need to be placed on bed rest and/or hospitalized.

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On December 5, I told my new manager, [REDACTED] about the pregnancy complications, travel restrictions, and the possibility that I would need to begin my maternity leave early. During the same conversation, [REDACTED] told me that there was a possible reorganization within [REDACTED] and that my management role on the team may not be available when I return from maternity leave. We had had no prior discussions of a potential reorganization, or any indication that my position may not be available when I returned from maternity leave.

Later in December, [REDACTED] and I discussed my early maternity leave and I told her that my obstetrician might place me on bed rest. [REDACTED] responded by telling me that she had just listened to an NPR segment that debunked the benefits of bedrest. She also shared that her own doctor had ordered her on bedrest, but that she ignored the order and worked up until the day before she delivered her child. [REDACTED] then reiterated that a management role was no longer guaranteed upon my return from maternity leave, and that she supported my interviewing for other roles at Google.

On January 3, 2019, I began experiencing concerning symptoms and notified [REDACTED] that I was beginning my maternity leave due to pregnancy complications. Later that same day, she sent me an email criticizing my work performance and stating that I was not meeting expectations. This was the first time [REDACTED] gave me any indications that I was not meeting the expectations of my role.

On May 1, 2019, while I was still on maternity leave, I received a Needs Improvement performance rating. I resigned from Google on August 9, 2019 upon completing my maternity leave.